m/45/022

CHADBOURNE & PARKE LLP

Counsel for Debtors and Debtors in Possession 30 Rockefeller Plaza New York, New York 10112 (212) 408-5100 Joseph H. Smolinsky (JS-8408) Hearing Date & Time: Objection Deadline:

April 10, 2002 @ 9:45 a.m.

DIV. OF OIL, GAS & MINING

April 5, 2002

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

MAGNESIUM CORPORATION OF AMERICA, et al.,

Debtors.

Chapter 11

Case No. 01-14312 (REG)

(Jointly Administered)

-----X

## OMNIBUS NOTICE OF HEARING WITH RESPECT TO APPLICATIONS FOR COMPENSATTION OF PROFESSIONALS

PLEASE TAKE NOTICE that the following applications (the "Applications") of professional retained by the Magnesium Corporation of America ("Magcorp") and Renco Metals, Inc. ("Metals" and together with Magcorp, the "Debtors"), will be considered at a hearing held before Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 620 of the Untied States Bankruptcy Court for the Southern District of New York, The Alexander Hamilton Customs House, One Bowling Green, New York, NY on Wednesday, April 10, 2002 at 9:45 a.m., or as soon thereafter as counsel may be heard.

Applicant	Application Period	Amount of Fees Requested	Amount of Expenses Requested	Total Compensation Requested	
Chadbourne & Parke LLP as Counsel for Debtors and Debtors in Possession	August 2, 2001 through December 31, 2001	\$532,510.50	\$84,549.86	\$617,060.36	
Chapman and Cutler <sup>1</sup> as Counsel to the Official Committee of Unsecured Creditors	November 5, 2001 through January 31, 2002	\$119,000.50	\$14,260.27	\$133,260.77	
Luskin, Stern & Eisler LLP as Local Counsel for the Official Committee of Unsecured Creditors	November 8, 2001 through February 28, 2002	\$ 7,087.50	\$ 320.09	\$ 7,407.59	
King & Spadling as Special Trade Litigation Counsel	August 2, 2001 through December 31, 2001	\$407,439.20	\$40,170.51	\$447,609.71	
Kibel Green Issa Inc. as Financial Consultants	November 15, 2001 through December 31, 2001	\$ 94,894.00	\$ 6,485.98	\$101,379.98	
Economic Consulting Services Inc. as Special Trade Litigation Consultant	August 2, 2001 through December 31, 2001	\$128,571.50	\$ 4,894.64	\$133,466.14	
Parson Behle & Latimer as Special Environmental Litigation Counsel	August 2, 2001 through December 31, 2001	\$496,148.00	\$46,588.21	\$542,736.21	

Willkie Farr & Gallagher, former counsel to the Official Committee of Unsecured Creditors, filed a final fee application seeking allowance of fees in the amount of \$236,470.00 and expenses in the amount of \$12,589.50 which application is scheduled to be heard on April 2, 2002.

KPMG LLP as Accountants	December 1, 2001 through December 31, 2001	\$105,261.00	\$ 0.00	\$105,261.00
Hatch, James &	August 2, 2001	\$ 27,873.00	\$ 565.79	\$ 28,438.79
Dodge as Special Utility Counsel	through February 28, 2002			

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the above referenced Applications shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, shall set forth the basis for the objection and shall be filed with the Bankruptcy Court and served upon the applicant to allow actual receipt no later than 5:00 p.m., April 5, 2002.

PLEASE TAKE FURTHER NOTICE that any objections filed by parties with legal representation must be filed: (a) (i) through the Bankruptcy Court's electronic filing system, which may be accessed (with a password which is available by contacting the Bankruptcy Court's technical assistance at (212) 668-2870, ext. 3522, Monday through Friday, 8:30 a.m. to 5:00 p.m.) through the Internet at the Bankruptcy Court's website: <a href="www.nysb.uscourts.gov">www.nysb.uscourts.gov</a>, using Netscape Navigator software version 3.0 or higher and (ii) in portable document format (PDF) using Adobe Exchange software for conversion; or (b) if a party is unable to file electronically, such party must submit the objection in PDF format on a diskette in an envelope with the case name, case number, type and title of document, court document number of the document to which the objection refers, and the file name on the outside of the envelope; or (c) if a party is unable to file electronically or use PDF format, such

party must submit the objection on a diskette in either a Word, WordPerfect, or DOS text (ASCII) format.

Dated: New York, New York March 15, 2002

## **CHADBOURNE & PARKE LLP**

By: s/ Joseph H. Smolinsky
Joseph H. Smolinsky (JS-8408)
A Member of the Firm

30 Rockefeller Plaza New York, New York 10112 (212) 408-5100

Counsel for the Debtors and Debtors in Possession